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MEMORANDUM

DATE: August 23, 1993

TO: John Stiller

CC: Gary Podrabsky
Nate Mathews
Dave Haddock

FROM: Joe Depner *JD*

PROJECT: Burlington Environmental Inc. Pier 91 RFI
Project Number 624878

SUBJECT: PROPOSED DECOMMISSIONING PROCEDURE FOR
TEMPORARY PIEZOMETER CP-122A

RECEIVED
AUG 25 1993

RCRA PERMITS SECTION

Attached is suggested wording for a response to be submitted to Mr. David Croxton of the U.S. Environmental Protection Agency (USEPA), Region X, Seattle. Please review the wording and contact me if you have comments or questions. Thank you.

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USEPA RCRA



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PROPOSED DECOMMISSIONING PROCEDURE
FOR SHALLOW TEMPORARY PIEZOMETER CP-122A
BURLINGTON ENVIRONMENTAL INC. PIER 91 FACILITY

August 23, 1993

This response concerns the decommissioning procedure proposed in the April 1993 work plan variance request submitted to the U.S. Environmental Protection Agency (USEPA) by Burlington Environmental Inc. (Burlington). Recall that as part of this variance request, Burlington proposed to decommission piezometer CP-122A by backfilling the 1.25-inch nominal diameter PVC casing with cement-bentonite grout.

In a meeting with Mr. David Croxton on 9 August 1993 Mr. Bob Farrell, consultant for USEPA, objected (via telephone) to the use of this procedure. It was agreed that Burlington would consider an alternative procedure and discuss the alternative with USEPA prior to USEPA approval of the variance request. The alternative procedure is summarized below.

Proposed Decommissioning Procedure

1. Over-drill the piezometer using a 3-inch nominal-diameter hollow stem auger, to a depth of approximately 10.5 feet below ground surface (bgs).
2. Remove the piezometer from the borehole by pulling it out through the hollow-stem auger.
3. While the auger is at maximum depth, pump a 5 percent bentonite/cement grout into the bottom of the borehole, using a tremie pipe inserted through the inside of the auger.
4. The auger and tremie pipe will be gradually removed from the borehole as the grout is pumped in, to minimize the potential for borehole caving. The tremie pipe outlet will be kept below the liquid grout level in the borehole at all times, and the auger will be kept below the level of the tremie pipe outlet at all times.
5. The borehole will be grouted to a depth of approximately 8 inches bgs. The concrete slab will be repaired by filling the remainder of the hole, to grade, with concrete Premix.
6. Traffic barriers will be placed around the decommissioned well for at least 24 hours following concrete repair, to allow the concrete to set up properly.